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**Attorneys for Plaintiff**

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PETER A. CASTILLO,

**Plaintiff,**

vs.

PAR TRUCKING INC., KEVIN  
REYES and JOHN DOES 1-10 (said  
names being fictitious,

**Defendants.**

SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION: **UNION COUNTY**

DOCKET NO.

CIVIL ACTION

**COMPLAINT AND JURY DEMAND**

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Plaintiff, PETER A. CASTILLO, residing at 488 West Grand Avenue, in the City of Rahway, County of Union, State of New Jersey, complaining of the defendants herein says:

**FIRST COUNT**

1. On or about November 10, 2021, the plaintiff, PETER A. CASTILLO, was the operator of a motor vehicle which was lawfully travelling straight on Randolph Avenue crossing Cragwood Road, in the Township of Woodbridge, County of Middlesex, and State of New Jersey.

2. At the time and place aforesaid, defendant, PAR TRUCKING, INC., a company of the State of Illinois, was the owner of a motor vehicle which was being operated by its agent, servant and/or employee, defendant, KEVIN REYES, a resident of the State of New Jersey.

3. At the time and place aforesaid, the defendant, PAR TRUCKING, INC., through its his agent, servant and/or employee, defendant KEVIN REYES, operated this vehicle so negligently and carelessly, while travelling on Randolph Avenue in the Township of Woodbridge, State of New Jersey illegally passing and smashing the vehicle operated by plaintiff, PETER A. CASTILLO, causing him to sustain serious personal injuries. colliding

4. As a direct and proximate result of the aforesaid negligence of the defendants, PAR TRUCKING, INC. and KEVIN REYES, the plaintiff PETER A. CASTILLO, suffered serious temporary and permanent injuries and suffered past, present and will suffer future pain and suffering and will require medical care and will expend diverse sums of money for her treatment and cure, and has in the past and will in the future, be prevented from attending to his normal activities.

WHEREFORE, plaintiff, PETER A. CASTILLO, demands judgment against the defendants, PAR TRUCKING, INC. and KEVIN REYES, for damages plus costs of suit on this Count.

#### SECOND COUNT

5. Plaintiff repeats the allegations contained in the previous counts of this Complaint and makes them a part hereof.

6. The defendants, John Does 1-10, are fictitious names intended to identify any and all parties including individuals, corporations and/or other entities whose identities are presently unknown to the plaintiff, who together with the named defendants were responsible for the ownership, operation, control, lease, and maintenance of the vehicles involved in the collision referred to herein or who in any way caused or

contributed to plaintiff's injuries.

7. As a direct and proximate result of the negligence of the defendants foresaid, plaintiff suffered serious physical and emotional injuries of both a temporary and permanent nature, considerable pain, anguish and suffering, shock, loss of wages and other special damages.

WHEREFORE, plaintiff Peter Castillo demands judgment against the defendants, John Does 1-10, for damages plus cost of suit on this Count.

JURY DEMAND

The plaintiff demands a trial by a jury as to all of the issues in the within matter.

DEMAND FOR INSURANCE INFORMATION

Pursuant to R. 4:10-2(b), plaintiff hereby demands production within 30 days of a copy of the contents of any insurance agreement under which the defendant may be covered in the action or to indemnify or reimburse for payments made to satisfy the judgment.

DESIGNATION OF TRIAL COUNSEL

Plaintiff designates David H. Kaplan, Esquire as Trial Counsel pursuant to Rule 4:25-4.

LAW OFFICE OF DAVID H. KAPLAN, LLC  
Attorneys for Plaintiff

Dated: July 5, 2022

/s/David H. Kaplan  
DAVID H. KAPLAN, ESQUIRE

CERTIFICATION

David H. Kaplan, of full age, hereby certifies as follows:

8. That the matter in controversy is not the subject of any other action pending in any Court or of a pending arbitration proceeding, and that no other action or arbitration proceeding is contemplated.

9. I know of no other party or person who should be joined in this action.

10. This Certification is made pursuant to Rule 4:5-1.

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

LAW OFFICE OF DAVID H. KAPLAN, LLC  
Attorneys for Plaintiff

Dated: July 5, 2022

/s/David H. Kaplan  
DAVID H. KAPLAN, ESQUIRE